

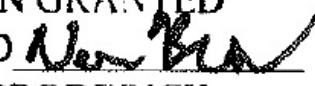


U.S. Department of Justice

United States Attorney  
Southern District of New York

**By ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J.

Dated: July 1, 2024

Re: *Tang, et al. v. United States of America*, No. 23 Civ. 9885 (VSB)

Dear Judge Broderick:

This Office represents the United States of America (the “Government”) in the above-referenced action. I write respectfully to request a five-day extension of the Government’s deadline to file its Rule 12(c) motion for judgment on the pleadings (i.e., from June 28, 2024, to July 3, 2024). This is the Government’s second request for an extension of the deadline to file its Rule 12(c) motion. The Court previously granted the Government’s consented-to request for an extension from June 21, 2024, to June 28, 2024. ECF No. 35. The Government respectfully requests another brief extension because it needs additional time to confer with the agency clients and to finalize its brief in support of the motion. Plaintiffs consent to this request.

I further respectfully request permission to expand the page limit for the Government’s memorandum of law in support of its Rule 12(c) motion from 25 to 40 pages. Although the Government does not intend to use all 40 pages unless absolutely necessary, the Government believes that additional pages will be required to sufficiently explain its arguments, given the complexities of the issues involved and the amount of potential liability for the United States. Plaintiffs consent to this request.

I thank the Court for its consideration of these requests.

Respectfully submitted,

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cc: Counsel for Plaintiffs (via ECF)